

COUNT 3: **Title 18, United States Code, Sections 201 and 371
- Conspiracy to Commit Federal Bribery and Receive
Illegal Gratuities**

57. The United States re-alleges and incorporates by reference the allegations set forth in paragraphs 1 through 35.

58. From in or about 1993, the exact beginning date being unknown to the Grand Jury, and continuing thereafter through at least April, 2003, in the District of Massachusetts,

**RAYMOND ASSELIN, SR.,
ARTHUR SOTIRION,
PETER DAVIS,
JOHN SPANO,
PAUL BANNICK,
JANET ASSELIN,
JAMES ASSELIN,
RAYMOND ASSELIN, JR.
JOSEPH ASSELIN,
MELINDA ASSELIN,
MARIA SERRAZINA,
CHRISTOPHER ASSELIN,
and,
MERYLINA ASSELIN,**

defendants herein, did unlawfully, willfully, and knowingly combine, conspire, confederate, and agree with each other and other persons both known and unknown to the Grand Jury to commit an offense against the United States, that is,

A. Defendants RAYMOND ASSELIN, SR. and ARTHUR SOTIRION, being a public official, did directly and indirectly corruptly demand, seek, receive, accept, and agree to receive and accept the things of value, all with the intent of being influenced in the performance of an official act; being influenced to commit

and aid in committing and to collude in, and allow, a fraud, and to make opportunity for the commission of a fraud; and being influenced to act and omit to do an act in violation of his official duty; and,

B. Defendants RAYMOND ASSELIN, SR. and ARTHUR SOTIRION, being a public official, otherwise than as provided by law for the proper discharge of official duty, did directly and indirectly demand, seek, receive, accept, and agree to receive and accept things of value for or because of any official act performed and to be performed by such official or person.

The Objects of the Conspiracy

The objects of the conspiracy were:

59. The United States re-alleges and incorporates by reference the allegations set forth in paragraphs 23 through 26.

The Means and Methods of the Conspiracy

60. The United States re-alleges and incorporates by reference the allegations set forth in paragraphs 27 through 35.

Overt Acts in Furtherance of the Conspiracy

As a part of and in furtherance of the above-described conspiracy and to accomplish the objects and purposes thereof, defendants herein and their co-conspirators did commit and cause to be committed the following overt acts:

61. The United States re-alleges and incorporates by reference the allegations set forth in racketeering acts 1

through 153.

All in violation of Title 18, United States Code, Sections 371, 201(b)(1)(A), (B), and (C), and 201(c)(1)(B).

COUNTS 4 - 84: Title 18, United States Code, Section 201 -
Federal Bribery and Receipt of Illegal Gratuity

62. The United States re-alleges and incorporates by reference the allegations set forth in paragraphs 1 through 27.

63. On or about the following dates, in the District of Massachusetts, the following defendants listed herein, being a public official, did directly and indirectly corruptly demand, seek, receive, accept, and agree to receive and accept the following things of value, all with the intent of being influenced in the performance of an official act; being influenced to commit and aid in committing and to collude in, and allow, a fraud, and to make opportunity for the commission of a fraud; and being influenced to act and omit to do an act in violation of his official duty:

<u>Count</u>	<u>Defendant</u>	<u>Date and Thing of Value Received</u>
4	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	G & R Associates, Inc. Check No. 789 for \$6,750.00 as payment for a new residential roof and barn roof at the residence of defendant SOTIRION's sister on or about 07/26/99
5	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	G & R Associates, Inc. Check No. 793 for \$1,125.00 as payment for pressure treated decking, two storm windows, and a load of mulch installed at defendant SOTIRION's rental property on or about 08/11/99

6	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	G & R Associates, Inc. Check No. 794 for \$2,375.00 as payment for automotive work on defendant SOTIRION's personal vehicles and his daughter's Ford Taurus on or about 08/11/99
7	RAYMOND ASSELIN, SR. ARTHUR SOTIRION JANET ASSELIN	G & R Associates, Inc. Check No. 802 for \$8,314.78 as payment for a new indoor air conditioning system installed at the residence of defendants RAYMOND and JANET ASSELIN, SR. on or about 08/21/99
8	RAYMOND ASSELIN, SR. ARTHUR SOTIRION RAYMOND ASSELIN, JR.	G & R Associates, Inc. Check No. 809 for \$1,267.13 Co. as payment for a sliding french door installed at the residence of defendant ASSELIN, JR. on or about 09/02/99
9	RAYMOND ASSELIN, SR. ARTHUR SOTIRION RAYMOND ASSELIN, JR.	G & R Associates, Inc. Check No. 820 for \$1,167.00 as payment for forty twenty foot lengths of Trex decking installed on the deck at the residence of defendant ASSELIN, JR. on or about 09/27/99
10	RAYMOND ASSELIN, SR. ARTHUR SOTIRION RAYMOND ASSELIN, JR.	G & R Associates, Inc. Check No. 822 for \$921.78 as payment for lumber and materials at the residence of defendant ASSELIN, JR. on or about 10/01/99
11	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	G & R Associates, Inc. Check No. 824 for \$1,000.00 as payment for a gas grill purchased by defendant SOTIRION
12	RAYMOND ASSELIN, SR. ARTHUR SOTIRION JAMES ASSELIN	G & R Associates Check No. 825 for \$8,400.00 as payment for windows and gutters installed at the residence of defendant JAMES ASSELIN on or about 10/07/99

13	RAYMOND ASSELIN, SR. ARTHUR SOTIRION JANET ASSELIN JAMES ASSELIN MARIA SERRAZINA	G & R Associates Check No. 826 for \$5,334.00 as payment for a Frigidaire stove and refrigerator for the residence of defendant MARIA SERRAZINA, and a General Electric microwave, Jenn-Air stove, and Whirlpool washer and dryer for the residence of defendant JAMES ASSELIN on or about 10/08/99
14	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	G & R Associates, Inc. Check No. 828 for \$1,500.00 delivered to defendant SOTIRION and subsequently cashed on or about 10/21/99
15	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	G & R Associates, Inc. Check No. 834 for \$6,000.00 delivered to defendant SOTIRION and subsequently cashed on or about 11/08/99
16	RAYMOND ASSELIN, SR. ARTHUR SOTIRION JOSEPH ASSELIN MELINDA ASSELIN	G & R Associates, Inc. Check No. 841 for \$800.00 as payment for four mirrors installed at the residence of JOSEPH and MELINDA ASSELIN on or about 12/21/99
17	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	G & R Associates, Inc. Check No. 845 for \$2,460.00 as payment for a digital camera, a DVD player, and other pieces of electronic equipment received by defendant SOTIRION on or about 01/05/00
18	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	G & R Associates, Inc. Check No. 847 for \$2,130.00 as payment for a reconditioned transmission and other automotive work on the personal vehicle of defendant SOTIRION's daughter on or about 01/14/00

19	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	G & R Associates, Inc. Check No. 848 for \$1,864.00 as payment for a coin wrapping machine for defendant ASSELIN, SR. and defendant SOTIRION's quarter skimming scheme on or about 01/20/00
20	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	G & R Associates, Inc. Check No. 853 for \$50,000.00 as the first installment of a \$100,000.00 payment to defendant ARTHUR SOTIRION on behalf of his brother on or about 03/17/00
21	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	G & R Associates, Inc. Check No. 865 and 879 totaling for \$1,114.13 Sons as payment for lumber and materials for a member of the Asselin family
22	RAYMOND ASSELIN, SR. ARTHUR SOTIRION CHRISTOPHER ASSELIN	G & R Associates, Inc. Check No. 884 for \$630.00 as payment for catering services for a campaign function held on behalf of defendant CHRISTOPHER ASSELIN on or about 06/24/00
23	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	G & R Associates, Inc. Check No. 893 for \$3,059.00 as payment for work on defendant JANET ASSELIN's Chrysler LeBaron and other personal vehicles belonging to members of the Asselin and Sorition family on or about 07/26/00
24	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	G & R Associates, Inc. Check No. 923 for \$50,000.00 as the final installment of \$100,000.00 payment to defendant ARTHUR SOTIRION on behalf of his brother on or about 08/15/00

25	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	G & R Associates, Inc. Check No. 946 for \$493.50 as payment for Hanson twenty pound gas grill propane cylinders and a Ducane gas grill replacement part for members of the Asselin and Sotirion families
26	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	G & R Associates, Inc. Check No. 1000 for \$2,430.00 as payment for body work on defendant SOTIRION's 1991 Cadillac and defendant JANET ASSELIN'S 1992 Chrysler LeBaron lumber on or about 11/08/00
27	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	G & R Associates, Inc. Check No. 1014 for \$800.00 delivered to defendant SOTIRION and subsequently cashed on or about 11/15/00
28	RAYMOND ASSELIN, SR. ARTHUR SOTIRION CHRISTOPHER ASSELIN	G & R Associates, Inc. Check No. 1053 for \$3,139.35 as payment for a Dell Pentium computer, office table, and highback leather chair for defendant CHRISTOPHER ASSELIN's office, and a 32" Sony television delivered to the residence of defendant SOTIRION on or about 01/17/01
29	RAYMOND ASSELIN, SR. ARTHUR SOTIRION RAYMOND ASSELIN, JR. CHRISTOPHER ASSELIN MERYLINA ASSELIN	G & R Associates, Inc. Check No. 1067 for \$5,957.51 as payment for new windows at the residences of defendants CHRISTOPHER and MERYLINA ASSELIN, and defendant ASSELIN, JR. on or about 05/21/01
30	RAYMOND ASSELIN, SR. ARTHUR SOTIRION CHRISTOPHER ASSELIN MERYLINA ASSELIN	G & R Associates, Inc. Check No. 1070 for \$650.00 as payment for tree service work to prepare for the installation of an in-ground swimming pool at the residence of defendants CHRISTOPHER and MERYLINA ASSELIN on or about 04/20/01

31	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	G & R Associates, Inc. Check No. 1078 for \$725.00 as payment for approximately twenty-five water filters for defendant ASSELIN, SR. on or about 05/08/01
32	RAYMOND ASSELIN, SR. ARTHUR SOTIRION RAYMOND ASSELIN, JR. CHRISTOPHER ASSELIN MERYLINA ASSELIN	G & R Associates, Inc. Check No. 1079 for \$2,100.00 as payment for labor to install new windows at the residences of defendants CHRISTOPHER and MERYLINA ASSELIN, and defendant ASSELIN, JR. on or about 05/10/01
33	RAYMOND ASSELIN, SR. ARTHUR SOTIRION CHRISTOPHER ASSELIN MERYLINA ASSELIN	G & R Associates, Inc. Check No. 1083 for \$8,100.00 as partial payment for an in-ground swimming pool and slide installed at the residence of defendants CHRISTOPHER and MERYLINA ASSELIN, on or about 05/16/01
34	RAYMOND ASSELIN, SR. ARTHUR SOTIRION CHRISTOPHER ASSELIN MERYLINA ASSELIN	G & R Associates, Inc. Check No. 1089 for \$2,100.00 as partial payment for an in-ground swimming pool and slide installed at the residence of defendants CHRISTOPHER and MERYLINA ASSELIN on or about 06/08/01
35	RAYMOND ASSELIN, SR. ARTHUR SOTIRION MARIA SERRAZINA	G & R Associates, Inc. Check No. 1094 for \$5,928.69 as payment for an alarm system installed at the residence of defendant MARIA SERRAZINA; a central vacuum system and an updated alarm panel installed at the rental property of defendant SOTIRION; and a global positioning system device for an automobile on or about 06/29/01

36	RAYMOND ASSELIN, SR. ARTHUR SOTIRION JANET ASSELIN MARIA SERRAZINA	G & R Associates, Inc. Check No. 1104 for \$6,000.00 as payment for a carport roof installed at the residence of defendants RAYMOND and JANET ASSELIN, SR.; a front porch at the residence of defendant MARIA SERRAZINA; and various roof jobs at the residence of defendant SOTIRION's father on or about 08/26/01
37	RAYMOND ASSELIN, SR. ARTHUR SOTIRION JOSEPH ASSELIN MELINDA ASSELIN CHRISTOPHER ASSELIN MERYLINA ASSELIN	G & R Associates, Inc. Check No. 1120 for \$5,000.00 as payment for exterior painting of the residence of defendants CHRISTOPHER and MERYLINA ASSELIN, and trim work at the residence of defendants JOSEPH and MELINDA ASSELIN on or about 09/06/01
38	RAYMOND ASSELIN, SR. ARTHUR SOTIRION CHRISTOPHER ASSELIN	G & R Associates, Inc. Check No. 1129 for \$2,480.00 as payment for approximately 20,000 to 30,000 campaign letters and 10,000 to 15,000 campaign envelopes for defendant CHRISTOPHER ASSELIN on or about 10/15/01
39	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	G & R Associates, Inc. Check No. 1130 for \$3,502.89 as payment for a washer and dryer for the residence of defendant CHRISTOPHER and MERYLINA ASSELIN; a Sony recorder delivered to defendant SOTIRION; Big E tickets and an Olympus digital camera on or about 10/15/01
40	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	G & R Associates, Inc. Check No. 1137 for \$661.50 as payment for seven hundred fifty (750) invitations and response cards for the Dolly Asselin Retirement Party on or about 11/14/01
41	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	G & R Associates, Inc. Check No. 1161 for \$1,165.00 as payment for two upright Hoover vacuums and a Canon copier on or about 12/15/01

42	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	G & R Associates, Inc. Check No. 1163 for \$600.00 as payment for one hundred Showcase Cinema movie tickets delivered to defendant SOTIRION on or about 12/27/01
43	RAYMOND ASSELIN, SR. ARTHUR SOTIRION JOSEPH ASSELIN MELINDA ASSELIN	G & R Associates, Inc. Check No. 1166 for \$4,150.00 as payment for a 12' by 16' outdoor shed installed at the residence of defendants JOSEPH and MELINDA ASSELIN on or about 01/02/02
44	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	G & R Associates, Inc. Check No. 1169 for \$1,870.00 as payment for a reconditioned transmission and other automotive work in defendant SOTIRION's personal vehicle on or about 01/08/02
45	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	G & R Associates, Inc. Check No. 1187 for \$1,725.00 as payment for a reconditioned transmission and other automotive work on defendant SOTIRION's Cadillac Brougham on or about 02/15/02
46	RAYMOND ASSELIN, SR. ARTHUR SOTIRION JOSEPH ASSELIN	G & R Associates, Inc. Check No. 1197 for \$100,000.00 to assist in the purchase of CHI Insurance Agency, Inc. by defendant JOSEPH ASSELIN on or about 03/01/02.
47	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	G & R Associates, Inc. Check No. 1202 for \$7,000.00 as payment for survey work at the residence of defendant SOTIRION's sister on or about 03/15/02
48	RAYMOND ASSELIN, SR. ARTHUR SOTIRION CHRISTOPHER ASSELIN	G & R Associates, Inc. Check No. 1211 for \$1,570.00 as payment for catering services for a political event for defendant CHRISTOPHER ASSELIN on or about 04/17/02

49	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	Manny's Plumbing & Heating, Inc. payment of \$3,000.00 for labor related to the kitchen remodeling at the residence of defendant SOTIRION in or about the fall, 1999
50	RAYMOND ASSELIN, SR. ARTHUR SOTIRION JOSEPH ASSELIN	Manny's Plumbing & Heating, Inc. k Check No. 1104 for \$27,450.00 as repayment of a loan taken from his employer by defendant JOSEPH ASSELIN on or about 01/20/00
51	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	Manny's Plumbing & Heating, Inc. payment of \$6,718.58 as payment for kitchen cabinets installed at the residence of SHA's Chief Purchasing Agent on or about 02/14/00
52	RAYMOND ASSELIN, SR. ARTHUR SOTIRION JOHN SPANO	Manny's Plumbing & Heating, Inc./G & R Associates, a Joint Venture Check No. 1129 for \$30,000.00 to Valley Flooring Covering, Inc. on or about 04/12/00
53	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	Manny's Plumbing & Heating, Inc. free labor and materials worth approximately \$12,245.68 for a plumbing system installed at the residence of SHA's Chief Purchasing Agent between on or about 11/00/99 and 06/00/00
54	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	Manny's Plumbing & Heating, Inc./G & R Associates, a Joint Venture Check No. 1162 for \$7,500.00 as payment for siding, gutters, and several pairs of shutters at the residence of SHA's Chief Purchasing Agent on or about 06/19/00
55	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	Manny's Plumbing & Heating, Inc. series of cash payments totaling \$25,000.00 beginning in or about September, 2000

56	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	Manny's Plumbing & Heating, Inc. series of cash payments totaling \$5,000.00 beginning in or about September, 2000
57	RAYMOND ASSELIN, SR. ARTHUR SOTIRION CHRISTOPHER ASSELIN	Manny's Plumbing & Heating, Inc./G & R Associates, a Joint Venture Check No. 1270 for \$450.00 as payment for twenty "Chris Asselin State Representative" signs measuring four feet by five feet for defendant CHRISTOPHER ASSELIN on or about 11/16/00
58	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	Manny's Plumbing & Heating, Inc./G & R Associates, a Joint Venture Check No. 1281 for \$2,800.00 as payment for a new engine in the van of SHA's Chief Purchasing Agent on or about 12/12/00
59	RAYMOND ASSELIN, SR. ARTHUR SOTIRION CHRISTOPHER ASSELIN	Manny's Plumbing & Heating, Inc./G & R Associates, a Joint Venture Check No. 1294 for \$8,700.00 as payment for approximately 60,000 to 80,000 letters and 40,000 to 50,000 envelopes for defendant CHRISTOPHER ASSELIN's 2000 campaign for state representative on or about 12/27/00
60	RAYMOND ASSELIN, SR. ARTHUR SOTIRION JANET ASSELIN JAMES ASSELIN	Manny's Plumbing & Heating, Inc. Check No. 7591 for \$787.97 as payment for five maple kitchen cabinet units for defendant JAMES ASSELIN on or about 03/22/01
61	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	Manny's Plumbing & Heating, Inc. free labor and materials worth approximately \$1,678.15 for plumbing services at the rental property of defendant SOTIRION on or about 08/01/01

62	RAYMOND ASSELIN, SR. ARTHUR SOTIRION JOSEPH ASSELIN	Manny's Plumbing & Heating, Inc. Check No. 9398 for \$77,200.00 as partial payment towards an outstanding debt owed to defendants ASSELIN, SR. and SOTIRION
63	RAYMOND ASSELIN, SR. ARTHUR SOTIRION JOSEPH ASSELIN	Manny's Plumbing & Heating, Inc. Check No. 9399 for \$122,800.00 to assist in the purchase of CHI Insurance Agency, Inc. by defendant JOSEPH ASSELIN on or about 06/10/02
64	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	Manny's Plumbing & Heating, Inc. free labor and materials worth approximately \$258.15 for plumbing services at the rental property of defendant SOTIRION on or about 06/14/02
65	RAYMOND ASSELIN, SR. ARTHUR SOTIRION CHRISTOPHER ASSELIN MERYLINA ASSELIN	Manny's Plumbing & Heating, Inc. free labor and materials worth approximately \$5,958.05 for the installation of a 400,000 BTU pool heater at the residence of defendants CHRISTOPHER and MERYLINA ASSELIN, 184 Bowles Park Extension, Springfield, MA on or about 09/30/02
66	RAYMOND ASSELIN, SR. ARTHUR SOTIRION JOHN SPANO	Valley Floor Covering, Inc. free carpeting and installation services worth approximately \$2,900.00 at the residence of SHA's Chief Purchasing Agent on or about the summer, 2000
67	RAYMOND ASSELIN, SR. ARTHUR SOTIRION JOHN SPANO CHRISTOPHER ASSELIN	Valley Floor Covering, Inc. free carpeting and installation services at the office of Defendant CHRISTOPHER ASSELIN, 604 Page Boulevard, Springfield, MA in or about 2001

68	RAYMOND ASSELIN, SR. ARTHUR SOTIRION JOHN SPANO JOSEPH ASSELIN MELINDA ASSELIN	Valley Floor Covering, Inc. free carpeting and installation services worth approximately \$2,295.00 at the residences of defendants JOSEPH and MELINDA ASSELIN and the rental property of defendant ARTHUR SOTIRION on or about 03/09/01
69	RAYMOND ASSELIN, SR. ARTHUR SOTIRION JOHN SPANO JANET ASSELIN	Valley Floor Covering, Inc. free carpeting and installation services at the Asselin vacation residence, 56 Stagecoach Drive, Chatham, MA in or about the summer, 2002
70	RAYMOND ASSELIN, SR. ARTHUR SOTIRION PAUL BANNICK	Cash payments approximately every two months by Paul Bannick to defendant RAYMOND ASSELIN, SR. and defendant ARTHUR SOTIRION during the calendar year 2000
71	RAYMOND ASSELIN, SR. ARTHUR SOTIRION PAUL BANNICK	Cash payments approximately every two months by Paul Bannick to defendant RAYMOND ASSELIN, SR. and defendant ARTHUR SOTIRION during the calendar year 2001
72	RAYMOND ASSELIN, SR. ARTHUR SOTIRION PAUL BANNICK	Cash payments approximately every two months by Paul Bannick to defendant RAYMOND ASSELIN, SR. and defendant ARTHUR SOTIRION during the calendar year 2002
73	RAYMOND ASSELIN, SR. ARTHUR SOTIRION PAUL BANNICK CHRISTOPHER ASSELIN	Free gifts for the 2002 "Committee to Elect Christopher Asselin" golf fundraiser in or about the spring, 2002
74	RAYMOND ASSELIN, SR. ARTHUR SOTIRION RAYMOND ASSELIN, JR. CHRISTOPHER ASSELIN	Purchase of Fleet Bank Cashier's Check Nos. 20794638 and 2079564 for \$14,000.00 by William Pappas to A & S Boats as partial payment towards the purchase of a twenty-three foot Chaparral 235SSi boat for the Asselin family on or about 06/26/00

75	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	M & D Remodeling Check No. 2469 for \$475.00 as payment for landscaping work at the residence of defendant SOTIRION on or about 04/24/01
76	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	M & D Remodeling Check No. 2487 for \$450.00 as payment for landscaping work at the residence of defendant ASSELIN, SR. on or about 05/26/01
77	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	M & D Remodeling Check No. 2536 for \$335.00 as payment for landscaping work at the residence of defendant SOTIRION on or about 08/02/01
78	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	M & D Remodeling Check No. 2695 for \$330.00 as payment for landscaping work at the residence of defendant SOTIRION on or about 11/05/01
79	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	M & D Remodeling Check No. 2281 for \$1,040.00 as payment for landscaping work at the residence of defendant SOTIRION on or about 05/21/02
80	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	Cash payments at least once a month by a minority SHA contractor to defendant ASSELIN, SR. and defendant SOTIRION during the calendar year 2000
81	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	Cash payments at least once a month by a minority SHA contractor to defendant ASSELIN, SR. and defendant SOTIRION during the calendar year 2001
82	RAYMOND ASSELIN, SR. ARTHUR SOTIRION	Cash payments at least once a month by a minority SHA contractor to defendant ASSELIN, SR. and defendant SOTIRION during the calendar year 2002

83	RAYMOND ASSELIN, SR. ARTHUR SOTIRION JOSEPH ASSELIN	Hilltop Construction, Inc. Check No. 3414 for \$27,300.00 to assist in the purchase of CHI Insurance Agency, Inc. by defendant JOSEPH ASSELIN on or about 06/21/02
84	RAYMOND ASSELIN, SR. ARTHUR SOTIRION JOSEPH ASSELIN	Hilltop Construction, Inc. Check No. 3441 for \$24,300.00 to assist in the purchase of CHI Insurance Agency, Inc. by defendant JOSEPH ASSELIN on or about 07/11/02

All in violation of Title 18, United States Code, Sections 201(b)(2)(A), (B), and (C), and 201(c)(1)(B), and Title 18, United States Code, Section 2.

COUNT 85: Title 18, United States Code, Sections 371 and 641 - Conspiracy to Commit Theft Against The Government

64. The United States re-alleges and incorporates by reference the allegations set forth in paragraphs 1 through 35.

65. From in or about June, 1988, the exact beginning date being unknown to the Grand Jury, and continuing thereafter through at least April, 2003, in the District of Massachusetts,,

**RAYMOND ASSELIN, SR.,
ARTHUR SOTIRION,
JANET ASSELIN,
JAMES ASSELIN,
RAYMOND ASSELIN, JR.,
JOSEPH ASSELIN,
MELINDA ASSELIN,
MARIA SERRAZINA,
CHRISTOPHER ASSELIN,
and,
MERYLINA ASSELIN,**

defendants herein, did unlawfully, willfully, and knowingly combine, conspire, confederate, and agree with each other and other persons both known and unknown to the Grand Jury to commit an offense against the United States, that is, to willfully and knowingly did steal and convert and cause to be stolen and converted to their own use and the use of another goods, property, and other things of value, including the value of SHA employee time and wages, in violation of Title 18, United States Code, Section 641.

The Objects of the Conspiracy

The objects of the conspiracy were:

66. It was an objective of the conspiracy to convert SHA resources, such as goods, property, and employee time and wages, including employee time and wages of the Executive Director and Assistant Executive Director of Maintenance, to the personal, pecuniary, and political benefit of members of and persons associated with the conspiracy.

67. It was an objective of the conspiracy to conceal the theft of SHA resources by falsely certifying to HUD on Annual Contribution Contracts, PHMAP certifications, and SEMAP certifications that SHA was in compliance with all applicable HUD rules and regulations, and causing SHA employees to issue false or deliberately vague purchase orders, submit false and misleading time cards, destroying evidence, secreting evidence, and obstructing justice.

Overt Acts in Furtherance of the Conspiracy

As a part of and in furtherance of the above-described conspiracy and to accomplish the objects and purposes thereof, defendants herein and their co-conspirators did commit and cause to be committed the following overt acts:

68. The United States re-alleges and incorporates by reference the allegations set forth in Racketeering Acts 162 through 238.

69. On or about June, 1988, defendant ASSELIN, SR. caused SHA to pay approximately \$2,764.05 to a local lumber

company for cedar shingles and roofing materials for the Asselin vacation home at 56 Stage Island Road, Chatham, MA.

70. On or about July 16, 1992, defendant SOTIRION caused SHA to pay approximately \$500.00 to a local electronics company for the installation of a new alarm system panel at the residence of defendant SOTIRION.

71. On or about July 27, 1992, defendant ASSELIN, SR. caused SHA to pay \$1,560.00 to a local auto body shop to purchase a 1987 Jeep Commande for SHA's Chief Purchasing Agent.

72. In or about March, 1993, defendants ASSELIN, SR. and SOTIRION began skimming approximately \$40.00 per week in quarters from the laundry facilities located in the Springfield Housing Authority's Riverview housing complex.

73. On or about April 20, 1993, defendants ASSELIN, SR. and SOTIRION caused SHA to pay a local automotive shop \$625.00 for the personal vehicle of a member of the Asselin or Sotirion families, said bill constituting the first bill out of a total of at least \$46,727.99 in payments from SHA to this local automotive shop for automotive work on the personal vehicles of defendants JANET ASSELIN, JAMES ASSELIN, RAYMOND ASSELIN, JR., JOSEPH ASSELIN, MARIA SERRAZINA, CHRISTOPHER ASSELIN, ARTHUR SOTIRION, and other members of the Sotirion family.

74. On or about June 14, 1993, defendant ASSELIN, SR. caused SHA to pay \$249.69 to a local lumber company to purchase a